

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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WT Docket No. 96-86

In the Matter of )  
)  
The Development of Operational, Technical, and )  
Spectrum Requirements for Meeting, Federal, State )  
and Local Public Safety Agency Communications )  
Requirements Through the Year 2010 )

To: The Commission

**REPLY COMMENTS OF Utah Communications Agency Network (UCAN)**

The Utah Communications Agency Network (UCAN) hereby submits the following reply comments filed in response to the Commission's Second Notice of Proposed Rulemaking in the above captioned proceeding.

The Utah Communications Agency Network was formed in the 1997 Utah State Legislature under House Bill 187. The Utah Communications Agency Network is a quasi governmental agency formed to develop a Public Safety Communications and Data Network to serve the citizens of State, City and County government within Utah. This agency is currently working on migrating existing users from the 150-450 MHZ Public Safety bands to an 800 MHZ trunked radio system on a region wide basis. The agency is managed by a Board of Directors which is elected from the overall group of users. This Board of Directors serves at the pleasure of the users and is responsible for management implementation and maintenance of the network. The network will eventually serve a multiplicity of agencies including Police, Fire, Highway Maintenance, Transportation, Natural Resources, Corrections and other general governmental services. The Agency is documented proof that multiple agencies can work together to achieve the common goal of developing a communications system and service that serves all. UCAN is currently finalizing its system design and will begin implementation during this year. The attached list reflects the participating agencies.

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## COMMENTS

UCAN wishes to file comments in support of those of the Association of Public Safety Communications Officials, International, Incorporated (APCO). In reviewing the Docket and the supporting information UCAN feels the following issues will become very pertinent to the development of future Public Safety services and systems. UCAN is highly supportive of the planning process in conjunction with the well defined national plan. The regional planning process will require local entities to be involved in the delineation and assignment of new spectrum allocations. This will create a situation where the users of the spectrum will be charged with governing themselves and will create a best use scenario for the spectrum allocated. We are also in an agreement that the regional planning will require active participation by the frequency coordinators and the inclusion of a common database to work from. Without having a common database and set of rules that we can all operate from, UCAN feels that the process will turn into chaos. There should also be some type of funding mechanism to allow for the regional planning process to take place. Obviously, this process will require travel, meetings, postage and other administrative costs to accomplish the task. The regional planning process should be well defined in a time line so that implementation of the spectrum does not go beyond a certain period of time. We believe there should be one coordinator designated as the Public Safety Coordinator for the use of this spectrum and feel that APCO, out of all the reply commentors, is the best coordinator to do that. They have current experience in regional planning and coordination of 800 MHZ spectrum, they have a local advisor assigned to each region, and are willing to provide technical, financial, and organizational support for the process. UCAN also feels there needs to be a strict set of auditing and oversight by the Federal Communications Commission. UCAN agrees that 10% of the spectrum is probably efficient for interoperability. Although, that does not diminish the needs for additional interoperability spectrum in the lower band. UCAN is also in support of the Project 25 Phase I common air interface standard as the digital base line for interoperability. Since no other agency, entity, equipment supplier, or company has come forth with an alternative that has gone through the scrutiny of the Project 25 process, we feel this will be the best alternative for a Public Safety systems. UCAN agrees that licenses for the 24 MHZ spectrum in this band should be limited to State and local government Public Safety entities. We

also are in agreement that Federal and some non-governmental entities such as private/Public Safety providers may need to have interoperability with these channels. These can be accomplished with interlocal agreements or interagency contracts. UCAN agrees that interference protection for incumbent full power broadcasters need to be minimized so as to maximize the Public Safety access and usability of this spectrum.

### **CONCLUSION**

We believe the Federal Communications Commission should move forward to develop the rules and policies for the expeditious use of this 746-806 MHZ spectrum and is highly supportive of APCO's initial comments with regards to this issue.

Respectfully submitted,

Utah Communications Agency Network

By: 

Steven H. Proctor

UCAN Interim Director

6000 State Office Building

SLC, UT 84114

1/23/98

**Utah Communications Agency Network  
Resolutions of Participation**

<b><u>Agency</u></b>	<b><u>Date of Resolution</u></b>
Woods Cross City	May 20, 1997
South Jordan City	July 1, 1997
Midvale City	July 8, 1997
Clearfield City	May 27, 1997
Orem City	July 1, 1997
Davis County	May 28, 1997
West Jordan	June 3, 1997
Murray City	June 10 1997
South Davis Fire	June 2, 1997
Granite School District	July 22, 1997
Layton City	July 17, 1997
West Valley City	August 7, 1997
Pleasant Grove City	August 5, 1997
Riverdale City	August 6, 1997
Clinton City	July 22, 1997
Sandy City	May 27, 1997
West Bountiful City	August 5, 1997
Bountiful City	August 6, 1997
Wasatch County	Sept. 15, 1997
Summit County	Sept.15, 1997
Weber County	Sept. 11, 1997
Salt Lake County	Sept. 17, 1997
Kaysville	July 15, 1997
Tooele County	Sept 16, 1997
Utah Transit Authority	Sept 17, 1997
Weber Fire District	Jan. 5, 1998

**State Participants:**

Utah Department of Public Safety  
Utah Department of Transportation  
Utah Department of Natural Resources  
Utah Department of Corrections  
Motor Vehicle Business Administration (Tax)  
Utah Department of Health (EMS Bureau)

**Pending:**

Salt Lake City  
Ogden City

## **Utah Communications Agency Network (UCAN) Executive Committee**

Commissioner Craig L. Dearden  
Sheriff Brad Slater, Weber County  
Sheriff Michael Spanos, Wasatch County  
Captain Jacob Hunt, Davis County  
Chief Sam Dawson, Salt Lake County  
Dave Thomas, Summit County  
Kari Sagers, Tooele County  
Captain Mike Fenton, Utah County  
Chief Brent Whatcott, Fire Chiefs Association  
Chief Doyle Talbot, Layton Police, At large member  
Captain Scott Mickelsen, Salt Lake County, At large member  
Honorable Edward T. Alter, State Treasurer  
Steve McCarthy, Utah Department of Transportation  
Michael Chabries, Utah Department of Corrections  
Brant Johnson, Utah Department of Natural Resources

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To: The Commission

REPLY COMMENTS OF [NAME OF AGENCY]

[Name of Agency] hereby submits the following reply to comments filed in response to the Commission's Second Notice of Proposed Rulemaking in the above-captioned proceeding.

[paragraph describing your agency]

[text of comments]

Respectfully submitted,

[name of agency]

By: [signature]  
[typed name of signatory]  
[title]  
[address]

[date]

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*APCO International - is the world's oldest and largest not-for-profit professional organization dedicated to the enhancement of public safety communications.*

*With more than 13,000 members world wide, APCO International exists to serve the people who manage, operate, maintain, and supply the communications systems used to safeguard the lives and property of citizens everywhere.*

January 9, 1998

Dear National Legislative Network Member:

APCO recently filed comments in the FCC's proceeding (WT Docket 96-86) to adopt rules for the 24 MHz allocated for public safety services in the 746-806 MHz band. The text of the FCC's proposals can be found on its webpage at

<http://www.fcc.gov/Bureaus/Wireless/Notices/1997/fcc97373.txt>.

The following is a summary of APCO's comments:

- Regional planning, in conjunction with a national plan, should be used for the new spectrum.
- Regional planning will require active participation by the frequency coordinator, a common database, and funding.
- APCO should be designated as the public safety coordinator for the 746-806 MHz band as it represents all elements of public safety; has experience with regional planning and coordinating 800 MHz frequencies, has local advisors in each region; and is prepared to provide organization, technical, and financial support for the planning process.
- No more than 10 percent of 24 MHz should be allocated for interoperability, although that does not diminish the need for interoperability spectrum in lower frequency bands.
- Project 25 Phase I (12.5 kHz FDMA) common air interface should be the digital baseline for interoperability.
- In most instances, licenses for 24 MHz should be limited to state and local government public safety agencies (recognizing that federal and some non-government entities will need access to interoperability channels).
- Interference protection for incumbent full-power broadcasters must be minimized so as to maximize public safety use of the spectrum.

- APCO also supported the comments of the National Public Safety Telecommunications Council (NPSTC), of which APCO is a member.

Public safety agencies are encouraged to file reply comments with the FCC on these issues. If you would like the full text of APCO's Reply comments contact Allison Kasold at +1.888.272.6911 ext. 271. Reply comments are due on January 26. Send an original and nine copies of your agency's reply comments to:

Secretary  
Federal Communications Commission  
1919 M Street, Room 222  
Washington, D.C. 20554

Thank you for your help and support with this issue.

Sincerely,



Joe McNeil  
President

The form of reply comments is as follows: